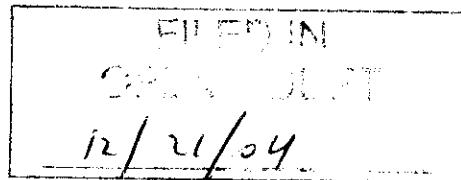


UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.04 11845 GAO

ROSARY DoCARMO, ADMINISTRATRIX
OF THE ESTATE OF MICHAEL DoCARMO *
Plaintiff,

v.
C&V FISHING CORPORATION and
F/V ILHA do CORVO *



PROPOSED DISCOVERY PLAN

1. Interrogatories and Rule 34 requests. Both parties have already served same. Both parties are ordered to respond to each discovery request on or before November 30, 2004.
2. Joinder of additional parties shall be sought on or before March 31, 2005.
3. All depositions (except *de bene esse* and expert depositions) shall be concluded on or before July 30, 2005.
4. Plaintiff shall provide defendant with expert reports and/or expert disclosures per Rule 26 on or before September 30, 2005.
5. Defendant shall provide plaintiff with expert reports and/or expert disclosures per Rule 26 on or before October 30, 2005.
6. Expert depositions shall be concluded on or before December 31, 2005.
7. Any motion pursuant to Fed. R. Civ. P. 56 shall be filed on or before December 30, 2005 and opposed on or before January 31, 2006.

Dated: October 22, 2004

The Plaintiff,
By her attorney,
JOSEPH G. ABROMOVITZ, P.C.

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The Defendant,
By their attorney,
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